

**Submission
No 240**

**INQUIRY INTO VOCATIONAL EDUCATION AND
TRAINING IN NEW SOUTH WALES**

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A submission to
NSW Legislative Council General Purpose Standing Committee No 6
Inquiry into vocational education and training in NSW

This submission is presented in TWO PARTS:

PART ONE (10 pages) – containing introductory material, general thesis, discussion and recommendations: this Part is “essential reading” and contains the main thrust of the submission; from time to time it makes reference to detailed information contained in

PART TWO – three Appendices containing “optional” evidentiary and technical information (including examples of training/assessment tools developed by the authors) supporting the exposition of argument in PART ONE and going into considerable detail that might more easily be dealt with by the authors addressing the Standing Committee in September.

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The purpose and desired outcome of this submission is for its authors to present evidence and potential solutions to issues raised, in person, at committee hearings in September 2015.

While the authors have the experience, ability and interest to address most of the matters raised in the terms of reference, they have chosen not to lose the power of the punch by the length of the swing and have focused their attention on two key issues requiring immediate and sustained attention in the delivery of vocational education and training in New South Wales, namely

- **Competency Based Training (CBT) Rollout**
- **Independent Assessment of Skills from RTO Outputs**

Terms of Reference Addressed

The relevant sections of the terms of reference are:

1 (b) the role played by public and private vocational education providers and industry

1 (d) the effects of a competitive training market on student access to education, training, skills and pathways to employment

1 (e) the level of industry participation in the vocational education and training sector ... including Competency Based Training

1 (f) the Smart and Skilled reforms, including:
(i) alternatives to the Smart and Skilled contestable training market and other funding policies

1 (g) any other related matter (with regard to CBT rollout)

Many of the items in Section 1 of the Terms of Reference are both inter-related and inter-dependent and there will be some overlap in discussion.

Given the background of the authors the following discussion conveniently draws upon material from the building and construction industry and the VET training sector associated with it; the illustrations and exemplars employed could, however, serve in the understanding of similar issues needing to be addressed in other VET disciplines and have a ready application as templates for change in some other industries and in the delivery of their technical training packages.

CONTACT PERSON

Graeme Wilton

Authors This document is a joint submission from Graeme Wilton and John Gray.

Graeme has the following background and experience:

Carpenter-Builder/TAFE Teacher with practical “hands on” building industry background and 30 years TAFE NSW experience with *Certificate III Carpentry* apprenticeship training, *Certificate IV (Building Studies)*, housing industry seminars, owner builder courses, etc; technical consultant and demonstrator in training video production; co-author of CPD package marketed through TAFE NSW in 2004-05 and of VLS professional development series of CPD materials.

Currently working out of TAFE New England Institute, Willo was Teacher of the Year in the New England region and NSW runner-up for VET Trainer/Teacher of the Year in 2012 for his work in pioneering interactive online services for distance learning apprentices and builders in rural and remote areas, a delivery platform which he continues to develop and with which he is very actively involved. He has over 200 YouTube training videos on the web.

You might like to let Willo introduce himself and some of his concerns relevant to this submission at https://youtu.be/KQP3ar_GJ0

John's qualifications and experience include:

Psychologist/Teacher/Writer – over 35 years experience in education, both Australia and overseas, including secondary and adult education with 8 years TAFE NSW; knowledge of and proficiency in assessment procedures and techniques and design of appropriate assessment tools; scriptwriting and production experience with technical training videos; co-author with Graeme Wilton of CPD materials (mentioned above) for builders to meet licensing renewal requirements.

John is now semi-retired but retains his enduring interest in training and assessment, particularly in the VET sector and specifically in the construction and building industry.

Both men have had a longstanding and very effective working partnership in the development, production and implementation of training solutions for the building industry since 1998.

In recent years their focus has been on the apparent “stalling” of effective competency based delivery in TAFE institutes, the proliferation of private RTOs and the inherent dangers of inappropriate regulation by ASQA (principally the failure to implement independent assessment of student skills), and the development of meaningful CBT assessment tools for the *Certificate III Carpentry* course for apprentices. (The latter could well provide a workable assessment template for other technical training disciplines.)

Their endeavour in these areas is fuelled by their abiding interest in maintaining a VET sector that continues to preserve standards and currency for the changing nature of technical training in this century; their efforts have been unpaid and unsupported by official resources and, despite numerous attempts to draw attention to their concerns at both federal and state levels, have largely gone unrecognised (apart from token acknowledgement) by the various educational bureaucracies one might expect to have shown interest.

The political/bureaucratic window of opportunity to display their wares has been difficult to unlock from the outside! However, it is hoped the ***Inquiry into vocational education and training in New South Wales*** by General Purpose Standing Committee No 6 may provide the necessary key.

We repeat:

The purpose and desired outcome of this submission is for its authors to present evidence and potential solutions to issues raised, in person, at committee hearings in September 2015.

1 COMPETENCY BASED TRAINING – ITS BENEFITS AND ITS SHORTFALLS

The Brave New World of CBT It was difficult to argue against what appeared to be a central principle of Competency Based Training (CBT) when it was introduced to/imposed upon the VET sector in the last decade of the twentieth century: how good would it be when people were recognised for what they could actually do – fantastic!

With the plausibility of the word “competent” ringing in the ears of educators/trainers, and the educational, political and administrative impetus with which the CBT regime was imposed, there was little real examination of what was entailed at the grass roots level in terms of analysis of skill sets, component skills, sub-skills *etc*; identification of changes required in the delivery of these skills (and their underpinning knowledge, if indeed that were deemed necessary); and development of appropriate assessment tools to evaluate the teaching and acquisition of competencies.

The CBT mould had been cast and vocational education and training was going to be made to fit!

Back to the Future With the intervening years of CBT experience and the 20/20 vision of hindsight, however, it is obvious to those who are actually involved in the day to day delivery of CBT that it has not been a “one stop shop” nor a “one size fits all” solution to the delivery of vocational training – although the easy and compliant lip service currently paid by RTOs, trainers and employers to the now entrenched CBT empire and its bureaucracy might suggest otherwise to the casual or superficial observer.

Prescriptive Regulation Not That Helpful This CBT bureaucracy is a somewhat distant and removed agent of regulation and enforcement, *not* an immediate part of the training delivery process; and, one suspects, with an administrative/regulatory rather than training background and perspective.

Evidence of this is in the “academic” cut-and-paste, multi-page per unit, Construction Training Package guidelines (Performance Criteria, Range Statement, Evidence Guide, Critical Aspects, *etc*) emanating from CITAB Canberra and couched in scholarly language far removed from the reality show of vocational education and (it would appear) more of a *pro forma* checklist written by people without much experience in the actual delivery of trade and technical training.

For example, (please refer to **Appendix A** for the following documents)

- consider the national guidelines for the unit of competency ***CPCCCA2002A (now CPCCCA2002B) Use carpentry tools and equipment*** – currently 11 pages of abstruse verbiage;
- some years ago when the authors first looked at the ***NSW Technical and Further Education Commission Student Assessment Guide (SAG)*** for this unit of competency, the state contribution was a sparse and pointless three-quarters of a page which dodged issues and responsibility with meaningless phrases such as “*your teacher will advise you of assessment requirements*”; “*your teacher will advise you of any resource requirements*”; and “*additional details for local assessment arrangements*” – followed by a completely blank space!

So: a prescriptive but not really helpful impost from federal authority with nothing of value added in the NSW guide; in other words ***let the teachers work it out however they want to***. Perhaps some of them won’t even want to ...

[We will shortly return to unit of competency ***CPCCCA2002A Use carpentry tools and equipment*** to show how it could be more meaningfully and effectively developed and delivered.]

Marching to Different Drums Once the politico-bureaucratic decision was made to espouse CBT, individual TAFE institutes were left to work out for themselves how to go about implementing it “at the coal face”. Many saw it as a task of simply translating the traditional syllabus/curriculum into the new language of CBT clichés; others (eg Box Hill, Victoria – carpentry apprentice training) essayed genuinely innovative attempts to analyse relevant skills and create measures of competence to evaluate their training efforts; Hunter Institute (Office Administration) focused on assessment, developing a bank of skill-related assessment tasks that grew in size as any co-campus that contributed one to the pool was entitled to receive two in return.

Free Market or Free For All? There appeared to be no real/helpful guidelines or correlation of effort from above, and individual institutes and even campuses were wandering in the new CBT wilderness. The ill-informed duplication of effort that started with the impost of CBT has continued with the fragmentation of TAFE NSW into ten semi-autonomous institutes competing against one another to attract client students in the free market of the RTO explosion – each now having to develop its own delivery and assessment platforms without any cooperation or cross-pollination.

A TAFE NSW united in its state-wide faculty disciplines rather than divided and isolated into geographical regions could have developed consistent training and assessments that would have been the benchmark for all competing RTOs – both public and private.

A divided TAFE ensures nothing special.

Accentuate the Positive What CBT did do was force technical training organisations and their staffs to have a closer look at what they had been doing traditionally, analyse the skills and knowledge they considered essential competencies, and re-examine how they would assess competence achieved.

Staff meetings, seminars, expert testimony *etc* contributed in great measure to the impression of the bounty and benefits of the new CBT world; in fact, however, in many institutes and on many campuses and in many faculties across TAFE NSW competency based training has been imperfectly understood, misinterpreted and even resisted by those who are expected to deliver and assess it.

These circumstances, unfortunately, continue to exist today.

Having a Go The authors of this submission, however, decided it was worthwhile giving it a go; returning to the example of **CPCCCA2002A Use carpentry tools and equipment** and to the completely blank space following “*additional details for local assessment arrangements*” in the **NSW Technical and Further Education Commission Student Assessment Guide (SAG)** (refer again to **Appendix A**), it was decided to fill in the blanks with regard to “*assessment requirements*” and “*resource requirements*”.

A lengthy and intense scrutiny of the requirements of genuine CBT and how it differed from traditional delivery of training and assessment for this unit of competency was carried out; this was done in conjunction with the possible use of the **Moodle** online delivery/assessment platform (a system which many TAFE institutes have but few, if any, use effectively to its real potential – the current authors have extensive research, evaluation and advice regarding Moodle systems for TAFE delivery but do not intend to digress in this submission).

De-projecting Assessments An important outcome of this analysis of CBT delivery and assessment was the concept of **de-projecting** the unit of competency which allowed the component skills in the **Use carpentry tools and equipment** unit to be identified as a preliminary to developing appropriate CBT assessments. Briefly by way of explanation, the traditional teaching/assessment of this skill set would be done by having a project – construction of a sawhorse was typical – which took considerable time (minimum 8 hours in workshop) and which then historically received a mark or grade.

This is obviously at odds with the dictates of CBT which specifies the dichotomy of **“Competent”/“Not Yet Competent”** as the only possible assessment outcomes. By isolating (*ie* de-projecting) the individual skills in the unit of competency it was possible to develop genuine CBT assessment tasks that took less time to administer, gave opportunity for practice and repeat attempts to those deemed **“Not Yet Competent”**, were certainly more objective in their evaluation of learning and performance, and which led to the desired outcome – **“Competent”**.

In CBT terms the resulting, newly-developed assessment tasks avoid the issues of the somewhat subjective grading of the old sawhorse; whether or not the usable but “rocky” sawhorse (*ie* one leg too short!) could be deemed **“Competent”**; and so on ... and provide evaluation tools with higher validity and reliability than historical methods.

Check This Out! Examination of the **STUDENT ASSESSMENT SHEET** and the **ASSESSOR INSTRUCTIONS** also in **Appendix A** gives an appreciation of a CBT assessment task for **Use carpentry tools and equipment** which truly evaluates competency in:

- accurate measurements and finished lengths
- square ends
- bevel and splay cuts with correct angles and without wind
- components skew-nailed together at correct distance and square
- satisfactory skew-nailing

The full assembly of materials, instructions, assessment jig, student checksheets etc for this unit is available in a convenient kit form that is portable and easily stored; it will be brought to Standing Committee hearings in September for examination by Committee members.

Indeed, with the sort of careful component skills analysis and specifically targeted assessments displayed in this example, there is a case to put for the CBT regime to be more correctly labelled CBA – Competency Based Assessment.

Unfortunately the apprentice doesn't get to take home a sawhorse!

User-friendly SAG To complete the transition from traditional Pass/Fail/Grading assessment and to bring the student apprentice into the CBT fold, the **NSW Technical and Further Education Commission Student Assessment Guide (SAG)** for **CPCCA2002A Use carpentry tools and equipment** was supplemented with a user-friendly, plain English explanation of what would be required of students – detailing what they would need to practise, learn, understand and do – explained in a language they could actually comprehend. **[In the Moodle delivery version the authors worked on, this was accompanied by online quizzes to test for underpinning knowledge to skills.]**

A draft copy of this improved **Student Assessment Guide** is provided in **Appendix A** for perusal by members of the Standing Committee.

[Other units of competency in the Construction Training Package for *Certificate III Carpentry* are in various stages of development by the authors but as these activities are unfunded and not supported as part of official duties, progress is slow.]

Anyone Seen the Baby? Unfortunately the blanket introduction of CBT and its enforcement as the only training delivery/assessment protocol to be considered “cutting edge” and worthy meant that all technical training had to be hammered into the CBT mould. This can lead to the loss of much that is of value in traditional methods of teaching and assessing – the following discussion points illustrate:

- CBT delivery/assessment requires analysis of skills virtually “to the nth degree” in order to isolate a particular skill for assessment so that it is not “contaminated” by other factors (*ie* other associated skills). Some skill sets lend themselves admirably to this format (*eg* the bevel and splay cuts *etc* in the assessment task already examined for ***CPCCCA2002A Use carpentry tools and equipment***); others do not, and attempts to break down some aspects of vocational training into more and more discrete skills has certainly resulted in the “baby being thrown out with the bathwater” (or perhaps the finished job being swept out of the workshop with the sawdust).
- A telling example from another (non-carpentry) technical discipline such as would be found in Business Administration is the writing of business correspondence, reports or indeed this submission: formatting, grammar, punctuation can all be taught as discrete skills; completeness of content, arrangement of ideas, logical argument are more subjective but can be isolated and evaluated to some degree. However, a trainee able to achieve “**Competent**” in all individual CBT assessments for the above subset of skills will not necessarily be able to produce a competent written submission.

Perhaps it is time to start thinking of *levels* of competence to avoid reducing the meaning of “competent” to merely “adequate”?

The whole is indeed often more than the sum of its parts – and this is worthy of recognition as a limitation on the CBT approach being applied to all vocational training.

- The positive advantages of the CBT approach for assessments of skills/units of competency that lend themselves to discrete analysis are:
 - less time to administer
 - timely opportunity for practice and repeat attempts until success is achieved
 - objectivity in evaluation of learning and performance

Some units of competency from *Certificate III Carpentry* that have been isolated to a degree that virtually divorces them from other genuinely CBT-assessable units are:

- CPCCCM1013A [plan & organise]
- CPCCCM1014A [communication]
- CPCCCM1012A [work effectively]
- CPCCOHS2001A [health & safety]

The latter unit (health & safety) for instance should permeate all workplace practice and all other units in a training package but its workable integration and acceptance is as much dependent on attitude as on knowledge or skill. When aspects of learning such as interpersonal skills, attitudes *etc* are involved, CBT is not necessarily the best option.

- CBT often separates out competencies/skills into discrete subsets for individual assessment but ignores evaluation of the overall skillset when they are integrated – as they obviously must be in the workplace.

Et Hoc Genus Omne There is much more to be examined in the rollout of CBT and the possible need for a review of its blanket application in the vocational education and technical training arena; however, it is appropriate at this juncture to address the second key issue to be considered in this submission – the necessary application of assessment as a quality assurance procedure in the ***Smart and Skilled*** contestable training market.

2 THE NEED FOR INDEPENDENT SKILLS ASSESSMENT IN THE WORLD OF PROLIFERATING RTOs

Jingle Bells Just as the word ***competent*** has a nice ring to it, so too does the NSW slogan ***Smart and Skilled*** – as also does the promising peel of the ***Australian Skills Quality Authority (ASQA)***, our federal watchdog over the quality and standards of VET delivery throughout the nation.

ASQA organisational structure (unchanged on its website since 2011 – see ***Appendix B***) indicates a heavy reliance on “up-front” regulation (and possibly hope and prayer!) to ensure that quality skills training is assured not only from public sector Registered Training Organisations (RTOs) such as TAFE but also from the burgeoning number of private providers.

Aw, Not More Red Tape? This organisational structure indicates intense regulation, compliance, registration, accreditation and investigatory functions (duplicated state by state – presumably at significant financial burden to taxpayers) *without feeling the need to examine the client-student outputs of the various RTOs they inspect and audit.* Consider the following:

Would it be thought acceptable for trainee drivers (L-platers) to be licensed on the say-so of their trainers (driving schools/parents) and let loose on the highways and byways of the nation without having sat for and passed a test of their driving ability?

Why is it required of both private and public secondary schools that their students sit for a Higher School Certificate independently set and marked by the Board of Studies – rather than have the schools issue their own certificates?

Proof of Product It is acknowledged that some form of the current ASQA bureaucracy oversight of the “front end of the RTO production line” is required; however, the true guarantee of quality RTO performance can only be the independent evaluation of the “product delivery end” – a function that can best be performed by a professional assessment-dedicated agency operating independently of the RTOs to monitor and assure skills quality.

Keeping the Customer Satisfied? Opening up of VET delivery to a contestable training market has resulted in a proliferation of private RTOs whose primary motivation is financial; while it is hoped all private (and public) providers operate within an ethical and responsible framework, there have already been instances of “flexibility” in ethics and rorting of the system as seen in Victoria in recent years.

The RTO flyer in **Appendix B** is typical of the advertising to be found in both hardcopy and online; without prejudice to this particular organisation which is presumably a registered training body (although no clear evidence of registration is given) and subject to ASQA regulation, the phrases “*get qualified in weeks!*”; “*no classroom study!*”; “*RPL specialist!*” and the promise to “*get your trade skills recognised ... and be done in a matter of weeks!*” should perhaps start at least a faint tinkle of alarm bells ... An RTO accepting client money to achieve these outcomes is under pressure from client expectation to deliver; this, in turn, is likely to put pressure on whatever evaluation/assessment procedures the organisation might have in place.

Up front ASQA regulation is no guarantee of the validity of any such internal self-regulatory evaluation/assessment practices; however, ***a battery of assessment tasks administered by a professional unit or agency operating independently of the RTO would ensure the client, the RTO, future employers, and certification and licensing authorities that requisite skills quality and levels were actually in evidence.***

C’mon the Blues! Were NSW to implement such an agency/strategy for external assessment of trainee outputs it would not only correct ASQA’s failure to conduct or require independent assessment of student skills but would also be more effective both in giving trainees, parents and employers confidence in the training certification awarded and in indicating those RTOs not performing to adequate standards. In fact, it would perhaps be the best possible incentive for RTOs to improve and maintain quality delivery – in other words, for them to continue to operate ... NSW could lead the way.

Been At It a While This suggestion was first put forward by the authors of this submission in September 2013 in a discussion sheet entitled

HOW DO WE KNOW APPRENTICES ACTUALLY HAVE THE SKILLS INDICATED BY THEIR CERTIFICATES?

A copy is included in **Appendix B** and members of the Standing Committee are urged to refer to it.

Attempts to address this issue of the need for independent assessment of RTO client skills in relation to the NSW ***Smart and Skilled*** program were made prior to the ***Smart and Skilled*** reforms being introduced in July 2014. This approach was facilitated by the generous assistance of Mr Adam Marshall MP, Member for Northern Tablelands, in making representations to the office of The Hon. Adrian Piccoli MP, Minister for Education, in mid-2013; the response from the Minister’s office (see **Appendix C** for the Minister’s letter – especially paragraphs 2 and 4) more-or-less sidestepped the issue with some eloquent phraseology that did not permit the independent assessment issue to be considered.

The last sentence in paragraph 4 of the Minister’s letter

A registered training organisation must seek the employer’s endorsement of competency achieved before a qualification can be issued.

gives cause for concern if the employer is to become the *de facto* agent of awarding certification!

A critique of some of the points made in the Minister’s letter was prepared by the authors of this submission in September 2013 with the intent of delivering it in person to the Minister’s office rather than propagate “warfare by correspondence”; unfortunately the opportunity to do so has not arisen. This critique is also to be found in **Appendix C** accompanying the Minister’s letter.

[Please note we are not having a whinge here – it’s just hard to get their attention! Thank goodness for the intelligent and good-looking members of the Standing Committee who are reading this submission ...]

But Wait There's More The complexities of discussing the issues of CBT rollout and assessment practices and the related need for independent skills assessment in the competitive RTO market can lead to intricacies perhaps too subtle to pursue further in this submission; needless to say the authors have much more to say but trust they have demonstrated a thorough grasp of the issues, a thoughtful understanding of the problems, and (most importantly) an approach to providing workable solutions.

They are pleased to make themselves available to the Standing Committee to further explain these concerns and to contribute to any wider discussion that will benefit the delivery of Vocational Education and Training of the highest quality in NSW.

RECOMMENDATIONS

- 1 That the rollout of Competency Based Training (CBT) in Vocational Education and Training be re-evaluated particularly with regard to assessment practices and procedures and that *Certificate III Carpentry* would be an appropriate mechanism to fund as a pilot study in doing this.
- 2 That the skill standards of all Registered Training Organisations (RTOs) be assured by setting up a professional independent assessment framework to monitor and evaluate all student/client skills prior to certification or licensing.
- 3 That the Standing Committee calls the authors of this submission to present evidence before its Members!